UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

JOE ALVES, individually and on behalf of all others similarly situated,

Plaintiff,

C.A. No. 1:22-CV-11820-IT

v.

THE GOODYEAR TIRE & RUBBER COMPANY,

Defendant.

ASSENTED-TO MOTION FOR ADMISSION PRO HAC VICE OF ATTORNEY MARK S. MELODIA

Pursuant to Local Rule 83.5.3(e) of the United States District Court for the District of Massachusetts, Michael T. Maroney, counsel for Defendant The Goodyear Tire & Rubber Company ("Goodyear"), respectfully requests that this Court enter an Order admitting Mark S. Melodia to appear and practice as counsel for Goodyear in this action *pro hac vice*.

In support of this motion, movant states as follows:

- Mr. Melodia is a partner in the law firm of Holland & Knight LLP, 31 West 52nd
 Street, New York, NY 10019.
- 2. Mr. Melodia is a member in good standing in every jurisdiction in which he has been admitted to practice.
- 3. Mr. Melodia is not the subject of disciplinary proceedings pending in any jurisdiction in which he is a member of the bar.
- 4. Mr. Melodia has not previously had a *pro hac vice* admission to this court (or other admission for a limited purpose under this rule) revoked for misconduct.

- 5. Mr. Melodia has read and agrees to comply with the Local Rules of the United States District Court for the District of Massachusetts.
- 6. Attached hereto as Exhibit A is a Certification of Mark S. Melodia in support of this motion.

WHEREFORE, the undersigned counsel respectfully requests an Order admitting Mark S. Melodia to appear and practice as counsel for Goodyear in this action *pro hac vice*.

Respectfully submitted,

THE GOODYEAR TIRE & RUBBER COMPANY,

By its attorneys,

(617) 523-2700

/s/ Michael T. Maroney
Michael T. Maroney (BBO #653476)
michael.maroney@hklaw.com
HOLLAND & KNIGHT LLP
10 St. James Avenue
Boston, MA 02116

Dated: November 16, 2022

LOCAL RULE 7.1 CERTIFICATION

I hereby certify that I have conferred with counsel for plaintiff, who assents to the relief requested in this motion.

/s/ Michael T. Maroney

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent those indicated as non-registered participants on November 16, 2022.

/s/ Michael T. Maroney

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